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July 26, 2024

VIA ECF

Hon. Stacey D. Adams, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street Room 4015
Newark, NJ 07101

Re: *In re HealthEC LLC Data Breach Litigation*,
Civ. No. 24-cv-000026

Dear Judge Adams:

Pursuant to the Court's July 10, 2024 Order, the parties submit this joint letter regarding the scheduled mediation and proposed briefing schedule on Defendants' filed and anticipated motions to dismiss. After conferring, counsel for Plaintiffs and counsel for HealthEC have scheduled an in-person mediation with Judge Joel Schneider (Ret.) on September 10, 2024. The other Defendants anticipate participating in the mediation as well. On July 22, 2024, the parties held a conference with Judge Schneider to discuss the mechanics of the mediation.

If this action is not fully resolved following mediation, then the parties propose the following briefing schedule:

- Defendants shall serve their Response(s) to Plaintiffs' Consolidated Complaint on the parties of record and file Proof of Service on CM/ECF by **September 27, 2024**.
- Plaintiffs shall serve their Response(s) to any Motions filed against the Consolidated Complaint on the parties of record and file Proof of Service on CM/ECF by **November 8, 2024**.
- Defendants shall serve their Reply(ies) in support of any Motions filed against the Consolidated Complaint on the parties of record and file Proof of Service on CM/ECF by **December 9, 2024**.

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Once all motion papers have been served, the moving parties shall file all motion papers under three separate docket entries by **December 16, 2024**.

If the Court has any questions, we are available at the Court's convenience.

Respectfully submitted,

CARELLA BYRNE CECCHI
BRODY & AGNELLO, P.C.

/s/James E. Cecchi
James E. Cecchi